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April 14, 2005

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of *Ex Parte* Meeting, WC Docket No. 04-36

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Federal Communications Commission's ("FCC") Rules, this letter serves to provide notice in the above-captioned proceeding of three *ex parte* meetings with Commissioner Adelstein, Commissioner Abernathy, and Commissioner Copps and Commission staff. On April 13, the undersigned accompanied Mr. Jeffrey Citron, Chairman and CEO of Vonage Holdings Corp. ("Vonage"), Ms. Brooke Schulz, and Mr. Christopher Murray, also of Vonage, to meet with Commissioner Jonathan S. Adelstein and Legal Advisors Scott Bergmann and Barry Ohlson. The second meeting was with Commissioner Kathleen Q. Abernathy and Legal Advisor John Stanley. The third meeting was with Commissioner Michael J. Copps and Legal Advisor Jessica Rosenworcel.

During the above-referenced meetings, Vonage discussed the manner in which it provides emergency service connectivity to customers in the United States. The description of the service provided to the Commission corresponded with descriptions previously submitted to the Commission.

Vonage provided information about the significant cooperation of various PSAPs in Washington and Rhode Island, as well as status of trials with Verizon and Qwest and discussions with SBC and BellSouth. Vonage discussed its trials undertaken in conjunction with public safety officials in King County, Washington and informed the Commissioners and staff that Qwest has agreed to permit Vonage to lease access to 911 interconnection trunks throughout its 14-state territory. With the access that Qwest has agreed to provide, Vonage will be able to route emergency service calls placed by its customers directly to public safety operators, which will help save lives and safeguard property. Vonage applauded Qwest for its willingness to put the health and safety of Americans before short-term competitive considerations.

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Vonage informed the Commissioners and staff that SBC has agreed to begin discussions on working cooperatively with Vonage to improve 911 offerings available to customers using VoIP. However, Vonage also noted its concern that SBC has already provided 911 interconnection access to its unregulated VoIP affiliate, while it continues to delay discussions about providing similar access to Vonage. The terms and conditions of the access granted its affiliate are also not being made public. Vonage reiterates its strong concern about any practice that would permit an ILEC to offer 911 access to its unregulated affiliate on a confidential and non-tariffed basis while restricting customers of other VoIP services from receiving the same level of access.

Vonage reiterated that it is working with Verizon and New York State on a trial for an interim solution that would permit the transmission of location and number information to customers in the New York City region. Vonage reiterates that it is important that the Commissioners issue a public statement regarding public access to PSAPs' administrative numbers, as these numbers serve an important public safety function. The National Emergency Number Association ("NENA") and VoIP providers have endorsed use of PSAPs' administrative numbers as an interim "I1" solution.¹ Until Vonage can obtain direct access to the incumbent LEC-controlled selective routers to implement the interim "I2" solution, however, public safety concerns make it imperative that Vonage's end users continue to have 911 dialing via PSAPs' administrative numbers. Qwest's cooperation has shown that implementing the I2 solution is technically feasible. However, Vonage and Qwest still need time to complete the provisioning and testing process before moving to the I2 solution. Moreover, until the other ILECs agree to provide Vonage similar direct access to selective routers, Vonage's end users need access to emergency services via the I1 interim solution.

Pursuant to the Commission's Rules, this letter is being submitted electronically to the Secretary for filing in the above-referenced proceeding.

Sincerely,

/s/
Tamar E. Finn

Counsel for Vonage Holdings Corp.

cc: Commissioner Kathleen Q. Abernathy
 Commissioner Jonathan S. Adelstein
 Commissioner Michael J. Coppers
 Scott Bergmann
 Barry Ohlson
 Jessica Rosenworcel
 John Stanley

¹ See http://www.nena.org/VoIP_IP/NENAVONVOIP%20press%20release%20FINAL%20112603.pdf.